

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

KEVIN FERM, Individually and as Next Friend of A. GIKANDIRO,	§
M. MUTESI,	§
S. UWIRINGIYIMANA, and	§
S. MYAMIKAZI	§
Plaintiffs,	§ §
V.	§ CIVIL ACTION NO. 3:15-cv-03592 §
JOSE LEON-RAMIREZ and GLOBAL TRANSPORT CORPORATION,	§ § §
Defendants.	§

**PLAINTIFFS' EMERGENCY AGREED  
MOTION TO SUBSTITUTE NEXT FRIEND**

Plaintiff Kevin Ferm, as Next Friend of A. Gikandiro, M. Mutesi, S. Uwiringiyimana, and S. Myamikazi, files this Emergency Agreed Motion to Substitute Next Friend, requesting that the Court order Catholic Charities, Diocese of Fort Worth, Inc. be substituted as Next Friend in this case. Plaintiffs state:

1. Since May 15, 2015, Catholic Charities, Diocese of Fort Worth, Inc. has been the Sole Managing Conservator of the four minor children. At the time of the auto collision in question on October 2, 2015 and when the lawsuit was filed,

Kevin Ferm was these minor children's foster parent and possessory guardian, who received permission from the Catholic Charities, Diocese of Fort Worth, Inc. to pursue the claim on behalf of the minor children. However, in March 2016, the children were moved across town into an integrated community and a new foster parent was assigned. Kevin Ferm is no longer possessory guardian but has remained in the lawsuit as the minor children's Next Friend.

3. Upon settlement, Joshua Audi, CFO/Vice President of Administration of Catholic Charities, Diocese of Fort Worth, Inc., has the authority to execute the releases on behalf of the minor children. In order for Defendants to be comfortable with the execution of the settlement releases, Defendants require that Catholic Charities, Diocese of Fort Worth, Inc. be substituted as Next Friend. Guardian *Ad Litem* Jason Meyer is also agreed with the relief sought by this Motion.

4. Plaintiffs respectfully request the Court enter an Order prior to the prove up hearing substituting Catholic Charities, Diocese of Fort Worth, Inc. as Next Friend for minor Plaintiffs.

Respectfully submitted,

TURLEY LAW FIRM

/s/ T Nguyen

T Nguyen  
State Bar No. 24051116  
6440 North Central Expressway  
1000 Turley Law Center  
Dallas, Texas 75206  
Telephone No. 214/691-4025  
Telecopier No. 214/361-5802  
Email: [tn@wturley.com](mailto:tn@wturley.com)

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF CONFERENCE**

On October 25, 2016, T Nguyen, counsel for Plaintiffs, confirmed with Defendants' counsel Paul Bezney and the Guardian ad litem Jason Meyer that they are AGREED to the relief sought by way of this Motion.

/s/ T Nguyen

T Nguyen

**CERTIFICATE OF SERVICE**

On this 25<sup>th</sup> day of October, 2016, the undersigned certifies that this document was filed and served on all counsel of record via ECF/Pacer.

/s/ T Nguyen  
T Nguyen